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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

CASE NO. 2:20-CR-0194 MCE

Plaintiff,

**STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER**

DANIEL STEWART
LUKE BURROUGHS.

DATE: June 24, 2021

TIME: June 24, 1988
TIME: 10:00 a.m.

TIME: 10:00 a.m.
COURT: Hon. Morrison C. England, Jr.

15 Defendants.

STIPULATION

18 1. By previous order, this matter was set for status on March 18, 2021. The Court continued
19 this matter by previous order to June 24, 2021.

20 2. By this stipulation, defendants now move to continue the status conference until
21 September 23, 2021, and to exclude time between June 24, 2021, and September 23, 2021, under Local
22 Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

24 a) The government has produced discovery associated with this case that includes
25 12,793 Bates numbered documents. This includes bank records; memoranda of interviews,
26 audio recordings, and video recordings. The government has also provided forensic images of
27 electronic devices to the defense.

b) Counsel for defendants desire additional time to review the discovery for this

1 matter, conduct investigation and research related to the charges, and to consult with their
2 clients.

3 c) Counsel for defendants believe that failure to grant the above-requested
4 continuance would deny counsel the reasonable time necessary for effective preparation, taking
5 into account the exercise of due diligence.

6 d) The government does not object to the continuance.

7 e) Based on the above-stated findings, the ends of justice served by continuing the
8 case as requested outweigh the interest of the public and the defendant in a trial within the
9 original date prescribed by the Speedy Trial Act.

10 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
11 et seq., within which trial must commence, the time period of June 24, 2021 to September 23,
12 2021, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
13 T4] because it results from a continuance granted by the Court at defendants' request on the basis
14 of the Court's finding that the ends of justice served by taking such action outweigh the best
15 interest of the public and the defendant in a speedy trial.

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1 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
2 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
3 must commence.

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5 IT IS SO STIPULATED.

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7 Dated: June 9, 2021

PHIL TALBERT
Interim United States Attorney

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9 Dated: June 9, 2021

/s/ JUSTIN LEE

JUSTIN LEE
Assistant United States Attorney

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11 Dated: June 9, 2021

/s/ DAVID D. FISCHER

DAVID D. FISCHER
Counsel for Defendant
Daniel Stewart

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14 Dated: June 9, 2021

/s/ CANDICE L. FIELDS

CANDICE L. FIELDS
Counsel for Defendant
Luke Burroughs

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19 IT IS SO ORDERED.

Dated: June 15, 2021



MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE